

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRIDGEVIEW BANK GROUP,)	
)	
Plaintiff,)	Case Number: 1:13-cv-509
)	
-vs-)	Hon. Judge Ruben Castillo
)	
ANN OSTER,)	Magistrate Judge Keys
)	
Defendant)	

**PLAINTIFF’S RENEWED RULE 55 MOTION FOR DEFAULT JUDGMENT
OF FORECLOSURE AND SALE**

NOW COMES the Plaintiff, Bridgeview Bank Group, by Kevin Ameriks, one of its attorneys, and in support of its Motion for Default Judgment pursuant to Federal Rule of Civil Procedure 55, states:

1. Plaintiff initiated these proceedings on January 22, 2013, seeking a Judgment of Foreclosure and Sale.
2. Defendant was duly served with a copy of the Complaint and Summons on January 26, 2013 as set forth on the attached Certificate of Service, and as memorialized by the Court in its docket entry #5 in this case on February 20, 2013.
3. More than twenty-one (21) days have elapsed since Defendant was served, and she has failed to answer, plead, or otherwise defend the allegations of Plaintiff’s Complaint.
4. Defendant’s failure to defend and deny the allegations of Plaintiff’s complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of Default Judgment. See 735 ILCS 5/15-1506 (“where all allegations of fact have been proved by verification of the complaint or affidavit, the court upon motion supporting by an affidavit stating the amount which is due the mortgagee, shall enter a judgment of foreclosure as requested in the complaint”).

5. Plaintiff's claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Judgment Affidavit, attached hereto.
6. Judgment remains appropriate in that Defendant is not in the military.

WHEREFORE, the Plaintiff respectfully requests that this Court enter an Order of Judgment of Foreclosure and Sale for that amount set forth and made certain in its Judgment Affidavit, in form substantially in conformity with the proposed Order submitted herewith, and for such Order to also provide for Appointment of a Special Commissioner and Waiver of Right of Redemption by Ann Oster as requested in the Complaint and companion Motions presented in conjunction herewith.

Respectfully submitted,

By: s/ Kevin Ameriks

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